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12 TIME USED BY ATTORNEYS13 ATTORNEY TIME USED

14	Ms. Hisel	4 hours 14 minutes
15	Mr. Waobikeze	0 hours 0 minutes
15	Mr. Lyanbadejo	0 hours 0 minutes

01:42:48

1 (Time: 9:34)

2 ALTA GARRETT, the witness, being duly
3 cautioned and sworn to tell the truth, the whole truth
4 and nothing but the truth, testified as follows:

5 EXAMINATION

6 BY MS. HISEL:

09:34:51 7 Q. Good morning, Ms. Garrett. My name is Mary Ann
8 Hisel.

09:34:54 9 A. Good morning, Ms. Hisel.

09:34:55 10 Q. How are you doing today?

09:34:56 11 A. Just fine. How are you?

09:34:58 12 Q. Good. You and I have never met before, have
09:35:01 13 we?

09:35:02 14 A. I don't think so.

09:35:02 15 Q. And here in this room, we've got Henry --

09:35:05 16 MS. HISEL: I'm not sure of your last name,
09:35:08 17 Henry.

18 MR. LYANBADEJO: Lyanbadejo.

09:35:12 19 MS. HISEL: You want to spell that for the
09:35:14 20 court reporter.

09:35:14 21 MR. LYANBADEJO: It's L-y-a-n-b-a-d-e-j-o.

09:35:18 22 MS. HISEL: And Waobikeze?

09:35:21 23 MR. WAOBIKEZE: Correct.

09:35:22 24 MS. HISEL: And I think that's
09:35:26 25 W-a-o-b-i-k-e-z-e?

09:35:26

1 MR. WA0BIKEZE: That's correct.

2 MS. HISEL: Very good.

3 BY MS. HISEL:

09:35:28

4 Q. And I think we're getting started here about

09:35:31

5 9:37 this morning. Could you state your full name for

09:35:35

6 the record, please?

09:35:37

7 A. Alta Lorraine Garrett.

09:35:40

8 Q. And what is your address?

09:35:42

9 A. 8155 Cantura Mills, Converse, Texas

09:35:49

10 78109.

09:35:50

11 Q. And what is your -- what is your date of birth,

09:35:53

12 Ms. Garrett?

09:35:54

13 A. 6/13/47.

09:35:59

14 Q. And your Social Security number?

09:36:01

15 A. 423-70-3990.

09:36:10

16 Q. And your driver's license number?

09:36:13

17 A. 10205543.

09:36:31

18 Q. Okay. Ms. Garrett, I'm marking here Deposition

09:36:34

19 Exhibit Number 1. I'll hand a copy to your counsel

09:36:39

20 what has been marked as Plaintiff's Exhibit --

09:36:43

21 Deposition Exhibit Number 1 and give you an opportunity

09:36:46

22 to look at that. Did I give you a chance to review it?

09:37:14

23 A. Yes.

09:37:23

24 Q. Have you ever seen that before?

25 A. I don't recall seeing it. I may have. I've

09:37:25 1 looked at so many materials.

09:37:27 2 Q. Sure.

09:37:27 3 A. But I don't recall seeing it.

09:37:29 4 Q. Okay. And does it appear to be the district's

09:37:32 5 notice of the intention to take your deposition today?

09:37:42 6 A. It appears to be.

09:37:43 7 Q. Okay. And we're scheduled here in our office

09:37:46 8 for 9:00 o'clock this morning; correct?

09:37:53 9 A. That's what it states, but I was told it would

09:37:55 10 be at 10:00 o'clock.

09:37:56 11 Q. Oh, okay. Who told you that?

09:37:57 12 A. I was told by my attorneys and also I was told

09:38:01 13 that it was going to be on a different date, but --

09:38:03 14 Q. Really?

09:38:04 15 A. -- like I said, I have not seen this.

09:38:08 16 Q. But in any case, you -- you were here today and

09:38:09 17 it was --

09:38:10 18 A. Right.

09:38:10 19 Q. -- if you were told to be here at 10:00, you

09:38:13 20 got here in plenty of time --

09:38:14 21 A. Right.

09:38:15 22 Q. -- and you actually showed up, which was good.

09:38:19 23 A. Okay.

09:38:19 24 Q. All right. Have you ever deposed before?

09:38:25 25 A. Supposed?

09:38:22

1 Q. Deposed. Have you ever been --
2 A. No, I have not been deposed before.

09:38:24

3 Q. Okay. So this is all new to you?
4 A. Yes.

09:38:27

5 Q. All right. And do you understand that you're
6 under oath here during this proceeding and you're sworn
7 to tell the truth?

09:38:32

8 A. Yes.
9 Q. And do you understand that in this process,
10 it's as if we are before a jury and what you're telling
11 the court reporter is your testimony as if you were
12 before a jury?

09:38:42

13 A. Yes.
14 Q. And do you understand that the court reporter
15 obviously is here today with us, but if you shake your
16 head, that's not something that she can put down in the
17 materials as she takes our testimony today; correct?

09:38:57

18 A. Right. Correct.

09:38:58

19 Q. Okay. So will you do me the favor of whenever
20 I ask you a question, if you would -- and you're doing
21 a great job so far -- of verbally and audibly
22 responding with either a yes or a no or whatever
23 testimony you might have?

09:39:08

24 A. Yes.

09:39:11

25 Q. Great. And because she is taking this

09:39:16 1 testimony today and there are several of us in here,
09:39:19 2 will you also do me the favor of working with me that I
09:39:22 3 don't interrupt you and you don't interrupt me as we --
09:39:25 4 as we go through taking the -- the -- go through
09:39:27 5 questions today?

09:39:28 6 A. Yes.

09:39:28 7 Q. Okay. And if you don't understand something --
09:39:34 8 because sometimes I may ask a question and get to
09:39:37 9 rambling and not make much sense, if you don't
09:39:41 10 understand, will you ask me to rephrase my question or
09:39:42 11 let me know that you don't understand?

09:39:45 12 A. I sure will.

09:39:46 13 Q. All right. All right. And is it okay with you
09:39:50 14 that if you answer my question, I'll assume that you
09:39:53 15 understood it?

09:39:55 16 A. Yes.

09:39:58 17 Q. Okay. And if you need a break, feel free to
09:40:01 18 let me know at any time. You can just jab your
09:40:02 19 attorney or motion to me --

09:40:03 20 A. Okay.

09:40:03 21 Q. -- and we'll -- we'll do that. Have you in the
09:40:08 22 past 24 hours had any drugs or alcohol?

09:40:12 23 A. No.

09:40:15 24 Q. Have you taken any medication in the last 24
09:40:15 25 hours?

09:40:15 1 A. A vitamin.

09:40:17 2 Q. Vitamin. What vitamin?

09:40:19 3 A. Calcium supplement.

09:40:23 4 Q. Okay. So you have not taken any prescription

09:40:26 5 medication in the last 24 hours?

09:40:28 6 A. No, I'm not on any prescription medications.

09:40:31 7 Q. So you don't take any prescription medication

09:40:34 8 or over-the-counter medication on a regular basis?

09:40:36 9 A. I take over-the-counter medications sometimes

09:40:39 10 for my sinus --

09:40:41 11 Q. What would that be?

09:40:42 12 A. -- sinus condition. It varies. Sudafed.

09:40:47 13 Q. Sure.

09:40:48 14 A. I can't even remember some of the names of

09:40:52 15 them. Claritin-D. It just depends.

09:40:54 16 Q. I'm familiar with that one.

09:40:56 17 A. Yes.

09:40:56 18 Q. But no prescription medication?

09:40:59 19 A. No.

09:41:03 20 Q. Would you say that there -- that you have any

09:41:06 21 physical or emotional reason why you can't testify

09:41:06 22 fully and completely today?

09:41:08 23 A. No.

09:41:13 24 Q. Okay. Ms. Garrett, have you ever been

09:41:13 25 arrested?

09:41:13

1 A. No.

09:41:14

2 Q. Have you ever filed a lawsuit?

09:41:22

3 A. No.

09:41:24

4 Q. Have you ever filed any charges or any claims
5 with any kind of governmental agency?

09:41:29

6 A. I don't recall any, no.

09:41:30

7 Q. Okay. So if -- you wouldn't have filed any
8 other claims or issues with the Equal Employment
9 Opportunity Commission?

09:41:38

10 A. Not with any -- any other instances, no.

09:41:42

11 Q. Okay. Or the Texas Workforce Commission?

09:41:45

12 A. No.

09:41:47

13 Q. Or the Commission on Human Rights?

09:41:53

14 A. No.

09:41:58

15 Q. Okay. And not with the Texas Education Agency?

09:42:00

16 A. No.

09:42:03

17 Q. Okay. Now, have you ever filed any grievances?

09:42:08

18 A. No.

09:42:11

19 Q. Okay. So you've never testified in court
20 before?

09:42:13

21 A. No, I haven't.

09:42:15

22 Q. Okay. Now, as you were getting ready for today
23 and getting ready to prepare for your deposition, did
24 you talk to anybody?

25 A. You mean like friends or family members?